

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS,
AMARILLO DIVISION**

DR. RONNY JACKSON, STUART and ROBBIE
FORCE, and SARRI SINGER,

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., et al,

Civil Action No. 2:22-cv-241-Z

Defendants.

PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT

Plaintiffs Dr. Ronny Jackson, Stuart and Robbi Force, and Sarri Singer, by and through counsel, and pursuant to Federal Rule of Civil Procedure 56(a) and Local Civil Rule 56, respectfully move this Court for partial summary judgment on the grounds that the Defendants' Economic Support Fund awards to Gaza and the West Bank violate the Taylor Force Act. First Amend. Compl. ¶ 111(f) and (g), ECF No. 43. There are no genuine issues of material fact, and the Plaintiffs are entitled to judgment as a matter of law. Each of the matters required by Local Civil Rule 56.3(a) are set forth in the accompanying Memorandum in Support.

In support of this Motion, the Plaintiffs rely on the following:

1. Plaintiffs' Appendix in support, filed contemporaneously herewith;
2. Plaintiffs' First Amended Complaint, ECF No. 43;
3. Defendants' Answer, ECF No. 61; and
4. All further evidence necessary to support this Motion.

The Plaintiffs respectfully request the following relief against the Defendants, their agents, servants, employees, attorneys, and all persons and entities in active concert or participation with them, directly or indirectly:

1. A declaratory judgment setting aside the Defendants' Economic Support Fund obligations and awards listed in Exhibit 4, App. 63–95, that do not fall within the exceptions provided under 22 U.S.C. § 2378c-1(b)(1) as being in excess of statutory authority; and
2. A permanent injunction prohibiting Defendants from making all future Economic Support Fund obligations and awards funding programs, projects, and activities outside of the three enumerated exceptions specified in 22 U.S.C. § 2378c-1(b) and/or for which the Palestinian Authority is otherwise responsible are unlawful, unless and until such time as the Defendant Blinken can certify the Palestinian Authority is in compliance with 22 U.S.C. § 2378c-1(a)(1)(A)–(D).

Wherefore, the Plaintiffs respectfully request that judgment be entered in their favor and against the Defendants.

[signature page follows]

Respectfully submitted this 30th day of September, 2024,

/s/ Michael Ding

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CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2024, I electronically filed the foregoing document through the Court's ECF system, which automatically serves notification of the filing on counsel for all parties.

/s/ Michael Ding
MICHAEL DING